

EXHIBIT 19-1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

PARKERVISION, INC.,

Plaintiff,

v.

TCL INDUSTRIES HOLDINGS CO.,
LTD., TCL ELECTRONICS HOLDINGS
LTD., SHENZHEN TCL NEW
TECHNOLOGY CO., LTD., TCL KING
ELECTRICAL APPLIANCES
(HUIZHOU) CO., LTD., TCL MOKA
INT'L LTD., and TCL MOKA
MANUFACTURING S.A. DE C.V.;

HISENSE CO., LTD. and HISENSE
VISUAL TECHNOLOGY CO., LTD. (F/K/A
QINGDAO HISENSE ELECTRONICS CO.),
LTD. and HISENSE ELECTRIC CO., LTD.

Defendants.

Case No. 6:20-cv-00945-ADA

Case No. 6:20-cv-00870-ADA

JURY TRIAL DEMANDED

**DECLARATION OF EDWARD J. MAYLE IN SUPPORT OF
DEFENDANTS' OPENING CLAIM CONSTRUCTION BRIEF**

I Edward J. Mayle, upon personal knowledge or information and belief, state as follows:

1. I am a lawyer with Kilpatrick Townsend & Stockton LLP, and am counsel for TCL Industries Holdings Co., Ltd., TCL Electronics Holdings Ltd., Shenzhen TCL New Technology Co., Ltd., TCL King Electrical Appliances (Huizhou) Co., Ltd., TCL Moka Int'l Ltd., and Moka Manufacturing S.A. De C.V. (collectively "TCL") in Case No. 6:20-cv-00945-ADA, and am counsel for Hisense Co., Ltd. and Hisense Visual Technology Co., Ltd. (f/k/a Qingdao Hisense Electronics Co., Ltd. and Hisense Electric Co., Ltd.) (collectively "Hisense") in Case No. 6:20-cv-00870-ADA. I am admitted to the bars of Colorado and the District of Columbia, and admitted in both of the above-referenced cases *pro hac vice*. I am over the age of 18 and otherwise competent to make this declaration.

2. I make this declaration on my own knowledge, except where otherwise noted. If called upon to testify regarding the contents of this declaration, I could and would completely testify to its accuracy.

3. Attached as **Exhibit 1** is a true and correct copy of USP No. 6,049,706.
4. Attached as **Exhibit 2** is a true and correct copy of USP No. 6,266,518.
5. Attached as **Exhibit 3** is a true and correct copy of USP No. 6,580,902.
6. Attached as **Exhibit 4** is a true and correct copy of USP No. 7,110,444.
7. Attached as **Exhibit 5** is a true and correct copy of USP No. 7,292,835.
8. Attached as **Exhibit 6** is a true and correct copy of USP No. 8,588,725.
9. Attached as **Exhibit 7** is a true and correct copy of USP No. 8,660,513.
10. Attached as **Exhibit 8** is a true and correct copy of USP No. 9,118,528.
11. Attached as **Exhibit 9** is a true and correct copy of USP No. 9,246,736.
12. Attached as **Exhibit 10** is a true and correct copy of USP No. 9,444,673.

13. Attached as **Exhibit 11** is a true and correct copy of the Claim Construction Order in *ParkerVision v. Intel Corporation*, Case No. 6:20-cv-00108-ADA (Jan. 26, 2021).

14. Attached as **Exhibit 12** is a true and correct copy of the Claim Construction Order in *ParkerVision v. Intel Corporation*, Case No. 6:20-cv-00562-ADA (July 22, 2021).

15. Attached as **Exhibit 13** is a true and correct copy of the Patent Owner Preliminary Response in IPR2014-00948 (Sept. 24, 2014).

16. Attached as **Exhibit 14** is a true and correct copy of the Institution Decision in IPR2014-00948 (Dec. 18, 2014).

17. Attached as **Exhibit 15** is a true and correct copy of “Subharmonic Sampling of Microwave Signal Processing Requirements,” by Peter A. Weisskopf (“Weisskopf”) (Weisskopf was filed as Petitioner’s Ex. 1023 in IPR2014-00948).

18. Attached as **Exhibit 16** is a true and correct copy of the Patent Owner Response in IPR2014-00948 (Mar. 19, 2015).

19. Attached as **Exhibit 17** is a true and correct copy of the Motion for Adverse Judgment in IPR2014-00948 (Oct. 22, 2015).

20. Attached as **Exhibit 18** is a true and correct copy of the Judgment / Final Written Decision in IPR2014-00948 (Oct. 29, 2015).

21. I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

Executed on August 23, 2021, in Denver, Colorado.

/s/ Edward J. Mayle
Edward J. Mayle